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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOHN GILLANE,

Plaintiff,

VS.

MEGA LIFE AND HEALTH INSURANCE COMPANY; and DOES 1 through 10, inclusive,

Defendants.

Case No.: 3:08-cv-00230-LRH-RAM

STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFF'S MOTION TO REMAND TO STATE COURT (First Request)

Plaintiff John Gillane and defendant The Mega Life and Health Insurance Company ("MEGA") (incorrectly sued as "Mega Life and Health Insurance Company") hereby stipulate and agree as follows:

- Plaintiff filed his Motion to Remand on May 30, 2008 1. (Document 8).
- Pursuant to LR 7-2(b) and Fed. R. Civ. P. 6(d), MEGA's 2. response to Plaintiff's Motion to Remand is to be filed on or before Tuesday, June 17, 2008.
- Plaintiff and MEGA agree that the time for MEGA to 3. respond to Plaintiff's Motion to Remand shall be extended to and including Thursday, July 17, 2008.
 - 4. This is the first request for additional time sought by

Case 3:08-cv-00230-LRH-RAM Document 10 Filed 06/12/08 Page 2 of 2

the parties with respect to Plaintiff's Motion to Remand. 1 stipulation is not submitted for the purpose of delay, but rather 2 to provide all parties additional time to consider facts and 3 evidence regarding the basis for federal question removal, and to 4 consider the possibility of claim resolution. 5 LAW OFFICES OF MATTHEW L. SHARP LAW OFFICES OF CURTIS B. 6 COULTER 7 By: /s/ Matthew L. Sharp By: /s/ Curtis B. Coulter 8 MATTHEW L. SHARP CURTIS B. COULTER Nevada Bar No. 3034 Nevada Bar No. 4746 9 419 Flint Street 403 Hill Street Reno, Nevada 89501 Reno, Nevada 89501 10 Attorney for Plaintiff
JOHN D. GILLANE Attorney for Plaintiff JOHN D. GILLANE JOHN D. GILLANE 11 Dated: June 6, 2008 Dated: June 6, 2008 12 LEWIS AND ROCA LLP 13

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By: /s/ Von S. Heinz VON S. HEINZ Nevada Bar No. 859 Suite 600 3993 Howard Hughes Parkway Las Vegas, Nevada 89169 Attorneys for Defendant THE MEGA LIFE AND HEALTH INSURANCE COMPANY

Dated: June 6, 2008

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ewis and Roxa LLP 3 Howard Hoghes Parkway Sure 600 Vegas Nevada 89169

IT IS SO ORDERED:

LARRY R. HICKS

UNITED STATES DISTRICT JUDGE

DATED: June 11, 2008